

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN

JOHN BULTHOUSE Individually and as  
Personal Representative for the Estate of  
Paul Bulthouse, Deceased,

PLAINTIFF,

-vs-

Case No.: 1:21-cv-00281  
Hon. Paul L. Maloney

COUNTY OF MUSKEGON, a municipal corporation, et. al.

DEFENDANTS.

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Attorneys for Defendants, Wellpath, LLC,  
Joseph Natole, M.D., Carleen Blanche, RN,  
Jessica Fairbanks, LPN, Ashleigh Severance,  
LPN, Aubrey Schotts, RN, Richele Marion,  
EMT, Danielle Carlson, LPN, Britni  
Brinkman, EMT and David Lopez, LPN,  
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**STIPULATION AND ORDER EXTENDING TIME TO ANSWER  
THE COMPLAINT AND FILE AFFIDAVITS OF MERITORIOUS DEFENSE**

Defendants, WELLPATH, LLC, JOSEPH NATOLE, M.D., CARLEEN BLANCHE, RN, JESSICA FAIRBANKS, LPN, ASHLEIGH SEVERANCE, LPN, AUBREY SCHOTTS, RN, RICHELE MARION, EMT, DANIELLE CARLSON, LPN, BRITNI BRINKMAN, EMT and DAVID LOPEZ, LPN, only, voluntarily accepted service of the Complaint (filed 3/29/2021) and filed appearances in this matter by their attorneys, FOLEY, BARON, METZGER & JUIP, PLLC, on 4/29/2021. Therefore Plaintiff's counsel has agreed to stipulate to extend the time for these defendants to answer the complaint 63 days from the date of the above referenced

appearances. Further Plaintiff's counsel agrees to extend the time for these defendants to file Affidavits of Meritorious Defense required by MCL 600.2912e to be due 91 days after these defendants file their answer to the Complaint.

THEREFORE, defendants Answer to the Complaint by WELLPATH, LLC, JOSEPH NATOLE, M.D., CARLEEN BLANCHE, RN, JESSICA FAIRBANKS, LPN, ASHLEIGH SEVERANCE, LPN, AUBREY SCHOTTS, RN, RICHELE MARION, EMT, DANIELLE CARLSON, LPN, BRITNI BRINKMAN, EMT and DAVID LOPEZ, LPN, only, shall be due filed on or before 7/6/2021, and their affidavit of Meritorious Defense pursuant to MCL 600.2912e shall be due filed on or before 91 days after Defendants file their Answer.

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DISTRICT COURT JUDGE

I stipulate to entry of the above order as to form and substance:

/s/Marcel S. Benavides with consent  
Marcel S. Benavides (P69562)  
Attorneys for Plaintiff

/s/Brian J. Richtarcik  
Brian J. Richtarcik (P49390)  
Attorneys for Defendants, Wellpath, LLC,  
Joseph Natole, M.D., Carleen Blanche, RN,  
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Severance, LPN, Aubrey Schotts, RN,  
Richele Marion, EMT, Danielle Carlson,  
LPN, Britni Brinkman, EMT and David  
Lopez, LPN, only

Prepared by:

/s/Brian J. Richtarcik  
BRIAN J. RICHTARCIK (P49390)